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THE NORTHERN TRUST COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

16 BRADLEY J. BUSBIN, THE TRUSTEE OF
17 THE GONZALES CHARITABLE
17 REMAINDER UNITRUST ONE,

18 Appellant,
19 vs.
20 SHOTGUN CREEK INVESTMENTS, LLC;
21 SHOTGUN CREEK LAS VEGAS, LLC;
21 SHOTGUN INVESTMENTS NEVADA, LLC;
22 and THE NORTHERN TRUST COMPANY,
22 LLC,
23 Respondents.

Case No. 2:20-cv-01299-JCM

Related Cases:

Case No. BK-S-18-12454-GS
Chapter 11

Case No. BK-S-18-12456-GS

Case No. BK-S-18-12457-GS

Adv. No. 19-01108-gs

**JOINT STIPULATION TO EXTEND
BRIEFING SCHEDULE
DEADLINES (FIRST REQUEST)**

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2 **JOINT STIPULATION TO EXTEND BRIEFING SCHEDULE DEADLINES**
3 **(FIRST REQUEST)**

4 COME NOW, pursuant to LR 7-1, Appellant BRADLEY J. BUSBIN, THE TRUSTEE OF THE
5 GONZALES CHARITABLE REMAINDER UNITRUST ONE (“Gonzales Trust”), by and through its
6 counsel of record, Mark Wray, Esq. of the Law Offices of Mark Wray, and Respondents SHOTGUN
7 CREEK INVESTMENTS, LLC; SHOTGUN CREEK LAS VEGAS, LLC; SHOTGUN
8 INVESTMENTS NEVADA, LLC; and THE NORTHERN TRUST COMPANY, LLC (collectively,
9 “Lenders”), by and through their counsel of record, Douglas D. Gerrard, Esq., of the law firm of Gerrard
Cox Larsen, hereby STIPULATE and AGREE as follows:

10 WHEREAS, this case presents unique factual and legal issues involving prior bankruptcy court
11 proceedings, district court proceedings, and appeals proceedings, extending back 18 years, to 2002; and

12 WHEREAS, the record in this case is voluminous, and includes court transcripts, court orders,
13 judgments, and appellate decisions, extending through the 18-year duration of this matter; and

14 WHEREAS, the parties now agree that they need additional time to fully brief this matter, and to
15 also accommodate conflicting schedules and concurrent deadlines in other litigation;

16 WHEREAS, this is the first request by the undersigned to seek any extension of the briefing
17 deadlines;

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1 **IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned counsel for
2 the named parties hereto, that Respondent Lenders shall have an additional seven (7) days to file their
3 Answering Brief in this matter, resetting the current deadline for the Respondent Lenders' Answering
4 Brief from Tuesday October 13, 2020 [ECF No. 17] to **Tuesday October 20, 2020**. Relatedly, the parties
5 stipulate and agree to extend the current deadline for Appellant Gonzales Trust's Reply Brief (if any) by
6 an additional seven (7) days, from Tuesday October 27, 2020 [ECF No. 17] to **Tuesday November 3,**
7 **2020**.

8 **IT IS SO STIPULATED.**

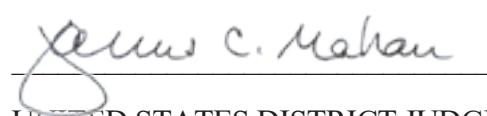
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10 Dated this 8th day of October, 2020

11 **GERRARD COX LARSEN**
12 /s/ Douglas D. Gerrard, Esq.
13 Douglas D. Gerrard, Esq.
14 Nevada Bar No. 4613
15 John M. Langeveld
16 Nevada Bar No. 11628
17 2450 St. Rose Parkway, Suite 200
18 Henderson, NV 89074
19 Attorneys for all Respondents

20 Dated this 8th day of October, 2020

21 **LAW OFFICES OF MARK WRAY**
22 /s/ Mark Wray, Esq.
23 Mark Wray, Esq.
24 Nevada Bar No. 4425
25 608 Lander Street
26 Reno, Nevada 89509
27 Attorneys for Appellants

28 **IT IS SO ORDERED:**

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31 UNITED STATES DISTRICT JUDGE

32 DATED: October 9, 2020

33 **GERRARD COX LARSEN**
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